

EXHIBIT C

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Po Box 861  
Trenton, New Jersey  
08625-0861

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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CALEB L. MCGILLVARY	) CIVIL ACTION NO.
PLAINTIFF	) 3:22-cv-06430-MAS-JBD
	) Hon. Michael A. Shipp, U.S.D.J.
V.	) Hon. J. Brendan Day, U.S.M.J.
	)
RAHMO REIZ	)
DEFENDANT	)

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NOTICE OF CHANGES TO DEPOSITION OF CALEB L. MCGILLVARY  
(Fed. R. Civ. P. 30(e))

TO: LORI N. LEWKOWITZ

Please take notice that pursuant to Rule 30(e) of the Federal Rules of Civil Procedure, the witness Caleb L. McGillvary makes the following statement of changes to the record of his deposition:

1. On page 7 line 2 the words "and I wish they represented" should be deleted and the words "And I, in which they represented" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. There was in fact an exchange occurring prior to the solemn affirmation, in which I invoked my right to review under Fed. R. Civ. P. 30(e), and in which counsel specifically told me that, as indicated in the order granting deposition, ECF

80, 83, the court reporter would be creating an audio recording of the deposition. The court reporter plugged a microphone into what appeared to be her stenography machine, which the meta data of the stenographic notes will likely show, and represented to me that she was recording audio of the deposition, thereby attaching her duty under Fed. R. Civ. P. 30 to retain that recording. The audio recording of this deposition shows that the latter phrase is what I actually said.

2. On page 8 lines 22-24 the words "(Loud noises occurring outside the room, continuously) should be added at the beginning of the deposition transcript, well before the words "There is a lot of noise going on outside of the room right now", for the reason that throughout the deposition, officers of the NJDOC were making an inordinate amount of noise outside the room in which the deposition was conducted. The audio recording of this deposition shows that the noises were disruptive.

3. On page 9 line 21 the words "at the end of '01" should be deleted and the words "at the end of 2012" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

4. On page 10 line 11 the words "not relevant to materials" should be deleted and the words "not relevant or material" substituted, for the reason that the transcript erroneously

substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

5. On page 10 line 16 the words "pass on the motion" should be deleted and the words "pass on the question" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

6. On page 12 line 13 the words "Ronald" should be deleted and the word "Rahmo" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

7. On page 13 line 4 the words "I wouldn't be" should be deleted and the words "I would be" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

8. On page 13 lines 9-10 the words "are caused for privileged health information, I asked them" should be deleted and the words "you're calling for privileged health information, I've answered them" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually

used. The audio recording of this deposition shows that the latter phrase is what I actually said.

9. On page 14 line 23 the words "62 weeks" should be deleted and the words "every two weeks" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

10. On page 15 lines 24-25 the words "logs their traffic control which is the" should be deleted and the words "walks over to traffic control, which is at the" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

11. On page 16 line 6 the words "(inaudible)" should be deleted and the words "appointment" substituted, for the reason that the transcript erroneously substituted "(inaudible)" for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

12. On page 16 line 8 the words "lab work" should be deleted and the words "lapel" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

13. On page 20 line 16 the words "good" should be deleted and the words "it's all good" substituted, for the reason that the transcript erroneously left out the first part of the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

14. On page 21 line 12 the words "Ronald" should be deleted and the words "Rahmo" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

15. On page 21 line 13 the words "periodontal" should be deleted and the words "performed the" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

16. On page 26 line 1 the words "new now (inaudible)" should be deleted and the words "New Years, a few days from the" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

17. On page 31 line 8 the words "document of this document" should be deleted and the words "docket, which is this document" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually



used. The audio recording of this deposition shows that the latter phrase is what I actually said.

18. On page 31 line 19 the words "from the document" should be deleted and the words "from the docket" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

19. On page 32 line 5 the words "1006" should be deleted and the words "106" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said. There is no F.R.E. 1006, whereas F.R.E. 106 is clearly what I'm referring to in the context of the section: the rule of completeness.

20. On page 32 line 7 the words "in the kind of health professionals" should be deleted and the words "it's, 'a confederacy of health professionals'" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

21. On page 32 line 17 the words "(inaudible)" should be deleted and the words "the full statement" substituted, for the reason that the transcript erroneously substituted "(inaudible)" for the

phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

22. On page 33 lines 19 to 20 the words "breaks an inmate's" should be deleted and the words "breaks inmates'" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

23. On page 36 lines 14 to 15 the words "traditionally notable in the New York Times Blued Shodly" should be deleted and the words "judicially noticeable in the New York Times' 'Blue Shadows' piece" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

24. On page 36 line 22 the words "(inaudible) as a copy (inaudible) and as" should be deleted and the words "forms such as in a coffee cup that changes hands as" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

25. On page 37 line 4 the words "a copy (inaudible) of or" should be deleted and the words "a coffee cup full of cash or" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The



audio recording of this deposition shows that the latter phrase is what I actually said.

26. On page 37 line 23 the words "organization local" should be deleted and the words "benevolent association local" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

27. On page 38 line 2 the word "mandatory" should be deleted and the word "mandatorily" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

28. On page 38 lines 23 to 24 the words "I may have (inaudible) surgery on tooth no. 14" should be deleted and the words "I have never had prior surgery on tooth no. 14" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said. I have, in fact, never had surgery on tooth no. 14 prior to 2021. There are so many erroneous substitutions by the court stengorapher during this deposition, with word salad garbling only testimony favorable to plaintiff and sound-alikes replacing phrases which would hurt defendant's case with others which would benefit the defendant, as to give rise to the doctrine of

objective chances. The court reporter's fudging of the transcript in a way to favor the defendant and prejudice the plaintiff happened such an extraordinary amount of times during this deposition, and coupled with the omission of whole sections and the apparent destruction or loss of the audio recording, this indicates a likely bias of the court reporter which renders the transcript unworthy of confidence.

29. On page 39 line 3 the words "prior to May 31, 2019 on tooth 14?" should be deleted and the words "prior to May 31 on any other teeth than tooth 14?" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase counsel actually used in her question. The audio recording of this deposition shows that the latter phrase is what counsel actually said. There are so many erroneous substitutions by the court stengorapher during this deposition, with word salad garbling only testimony favorable to plaintiff and sound-alikes replacing phrases which would hurt defendant's case with others which would benefit the defendant, as to give rise to the doctrine of objective chances. The court reporter's fudging of the transcript in a way to favor the defendant and prejudice the plaintiff happened such an extraordinary amount of times during this deposition, and coupled with the omission of whole sections and the apparent destruction or loss of the audio recording, this indicates a likely bias of the court reporter which renders the transcript unworthy of confidence.

30. On page 39 line 10 the words "(inaudible)" should be deleted and the words "charts" substituted, for the reason that the transcript erroneously substituted "(inaudible)" for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

31. On page 39 line 13" the words "dental, " should be deleted and the words "dentist who are" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

32. On page 40 line 1 the words "those too." should be deleted and the words "those teeth." substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

33. On page 42 line 3 the words "and federal" should be deleted and the words "under federal" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

34. On page 42 line 4 the words "1006" should be deleted and the words "106" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

35. On page 42 lines 20 to 22 the words "the (inaudible) define comes from, I believe, the (inaudible) which means all and/or recollection which means" should be deleted and the words "the word panorex which I define comes from the Greek 'pan' which means 'all' and 'orex' which means 'mouth'" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

36. On page 42 line 24 the words "beam table" should be deleted and the words "bendable" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

37. On page 43 line 9 the words "the logical route of the record means" should be deleted and the words "the logical conclusion of what the word means" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

38. On page 46 line 15 the words "amalgamated" should be deleted and the words "amalgam" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

39. On page 47 line 3 the words "at the request" should be deleted and the words "organizational practice" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

40. On page 48 lines 4 to 5 the words "response to a -- what" should be deleted and the words "response to what" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

41. On page 49 line 7 and line 9 the word "January" should be deleted and the word "June" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase counsel actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

42. On page 50 lines 19 to 25 the entire section starting from the words "On January 7 of 2020" and continuing until the words "continuation of DX" are misattributed to counsel when, in fact, they are actually my answer to counsel's question. Additionally, the word "DX" should be deleted and the word "TX" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio



recording of this deposition shows that the latter phrase is what I actually said.

43. On page 53 line 12 the words "tooth No. 3" should be deleted and the words "tooth No. 14" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

44. On page 54 line 1 the words "January 2nd" should be deleted and the words "January 7th" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

45. On page 57 line 21 the words "when I wrote this two weeks" should be deleted and the words "what I wrote is a few weeks" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

46. On page 59 line 25 to page 60 line 1 the words "time period leading up to the weeks before Christmas in 2021?" should be deleted and the words "time period leading up to, in the weeks before, Christmas in 2021?" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.



47. On page 61, there is an exchange between Keith Ronan and myself which was omitted from the record, in which I objected to the seating arrangements which put me in an extremely uncomfortable seat which was different than the three seats provided for counsel and the court reporter. This exchange should have been inserted between lines 2 and 3 on this page, for the reason that the omission is of objections I made to the conduct of the deposition that are relevant to the proceeding.

48. On page 65 line 9" the words "waylaid" should be deleted and the words "right next" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

49. On page 67 line 18 the words "January 2" should be deleted and the words "January 7" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

50. On page 73 lines 8 to 11 the words "I want to find what I meant. He had seen me, Riez radiograph imaged my tooth 14, apical x-ray which is the same machine as the -- (inaudible) or recollection" should be deleted and the words "I want to clarify what I meant by 'he had seen me.' Lopez radiograph imaged my tooth 14 with a periapical x-ray, which is the same machine as the panorex machine." substituted, for the reason that the

transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

51. On page 73 line 16 the words "a cusp in the filling of" should be deleted and the words "the cusp on the inner side of" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

52. On page 73, the words on line 23 are misattributed to me when they are, in fact, the questioner's words. The audio recording of this deposition shows this.

53. On page 74 line 4 the words "I didn't mean to" should be deleted and the words "it's the etymological root" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

54. On page 76 lines 4-5 the words "he actually said that. Now, first of all" should be deleted and the words "he actually said that's not the case at all" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

55. On page 77 line 17 the words "nobody had access" should be deleted and the words "nobody else had access" substituted, for the reason that the transcript erroneously omitted the word "else" from my answer. The audio recording of this deposition shows that the latter phrase is what I actually said.

56. On page 78 line 3 the words "because what he said" should be deleted and the words "but I'm sure that he said" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

57. On page 78 line 19 the words "and Don Fitch" should be deleted and the words "and LaShawn Fitch" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

58. On page 79 line 6 the words "a month" should be deleted and the words "the months" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

59. On page 79 line 14 the words "on lockdown yet. I was not called" should be deleted and the words "on lockdown, yet I was

not called" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said. The punctuation completely changes the meaning of the phrase, which is further doctrine of objective chances evidence of the bias of the court reporter rendering this transcript unworthy of confidence, because it incontrovertibly shows that she changes the meaning of phrases to the detriment of Plaintiff's case and the benefit of Defendant's.

60. On page 79 lines 15 to 18 the words "my tooth nerve was exposed during which time it -- any time I had food in my mouth there was an ice cube in my mouth. Anytime I had hot -- I've stated for two months my nerve was exposed. I was in serious pain. I didn't think I needed treatment." should be deleted and the words "my tooth nerve was exposed, during which time it hurt any time I had hot food in my mouth or when there was an ice cube in my mouth, any time I had hot or cold drinks. For two months my nerve was exposed. I was in serious pain. The dentist said that I needed treatment." substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said. There are so many erroneous substitutions by the court stengorapher during this deposition, with word salad garbling only testimony favorable to

plaintiff and sound-alikes replacing phrases which would hurt defendant's case with others which would benefit the defendant, as to give rise to the doctrine of objective chances. The court reporter's fudging of the transcript in a way to favor the defendant and prejudice the plaintiff happened such an extraordinary amount of times during this deposition, and coupled with the omission of whole sections and the apparent destruction or loss of the audio recording, this indicates a likely bias of the court reporter which renders the transcript unworthy of confidence.

61. On page 80 lines 2 to 3 the words "which a -- (inaudible) if I get -- in the upper said" should be deleted and the words "which is rife with MRSA, which if I get it in the upper side" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

62. On page 80 line 4 the words "cause abscess, cause" should be deleted and the words "it could cause an abscess, it could cause" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

63. On page 80 lines 11 to 14 This section has completely omitted descriptions of my symptoms, as well as an exchange between



myself and the court reporter, wherein I said to her after noticing she was vigorously shaking her head in disagreement at any answer I gave which was detrimental to the Defendant's case or beneficial to mine, "Excuse me, Ms. Court Reporter, are you OK? Please let the record show that the court reporter has been vigorously shaking her head side to side in a negative fashion as I've been answering this question and throughout the deposition." Whereupon the court reporter began to explain that she had hay fever or some form of serious allergic reaction to the cleaning solutions used in the room in which the deposition was conducted, which is what caused her to incessantly sneeze and sniffle and cough, with an extremely runny nose, the entire duration of the deposition. At this point, Ms. Flood asked her if she'd like to take a break. After the court reporter responded in the affirmative to Ms. Flood's question, the deposition was adjourned for approximately 20 minutes. This exchange should be included, for the reason that my objections to the irregularities and conduct of the deposition are relevant to the proceeding.

64. On page 82 line 3 the words "could you just" should be deleted and the words "could I just" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.



65. On page 84 line 1 the words "DBH, Dielectric" should be deleted and the words "DBT, Dialectical" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

66. On page 84 line 3 the words "medication" should be deleted and the words "meditation" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

67. On page 84 lines 5 to 7 the words "accept and proof accepts [sic] is short for objectivity, contribution. So, in comparison to" should be deleted and the words "A.C.C.E.P.T.S. and I.M.P.R.O.V.E. 'A.C.C.E.P.T.S.'" is short for 'A' as in Activity, 'C' as in contribution, and so on. 'C' is Comparison to" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

68. On page 84 line 12 the word "DBH" should be deleted and the word "DBT" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

69. On page 85 line 2 the words "with him" should be deleted and the words "with them" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

70. On page 85 line 8 the words "to the PTSD is the condition" should be deleted and the words "to the preexisting condition" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

71. On page 89 lines 10 to 11 the words "I had asked -- and the other inmates -- and notice of claim" should be deleted and the words "I had asked around to the other inmates, I had filed a notice of claim" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

72. On page 90 line 3 the words "I read here from my" should be deleted and the words "I read here, and from my" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

73. On page 91 line 10 the words "cited Ronald" should be deleted and the words "slated Rahmo" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

74. On page 91 lines 14 to 15 the words "professionals as to kind of covered up afterwards" should be deleted and the words "professionals who lie and cover it up afterwards" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

75. On page 92 lines 14 to 16 the words "ambiguous, something somebody, qualifying qualification for a medical license and with the letter." should be deleted and the words "ambiguous, saying things in a way that I question how he met qualifications for a medical license with the state board." substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

76. On page 95 line 12 the words "can testify" should be deleted and the words "can't testify" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

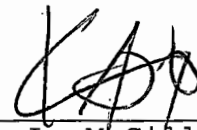
77. On page 97 line 15 the words "years, I think" should be deleted and the words "therapist-client" substituted, for the reason that the transcript erroneously substituted this word salad for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

78. On page 97 line 23 the words "yesterday, the law library held a" should be deleted and the words "yesterday at the law library, I filed a" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

79. On page 99 line 3 the words "has now been entered" should be deleted and the words "has not been entered" substituted, for the reason that the transcript erroneously substituted this sound-alike phrase for the phrase I actually used. The audio recording of this deposition shows that the latter phrase is what I actually said.

Date:

3/24/25



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